



Bay Area Clean Water Agencies

Leading the Way to Protect Our Bay

A Joint Powers Public Agency

P.O. Box 24055, MS 702

Oakland, California 94623

November 15, 2006

Via electronic mail

Ms. Tracie Billington
Planning & Local Assistance
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Dear Ms. Billington:

**Comments on Funding Recommendations for
Integrated Regional Water Management Program**

The Bay Area Clean Water Agencies (BACWA) would like to thank the DWR and SWRCB staff that put time and effort into establishing and working through the IRWM evaluation process. The Bay Area proposal was not within the funding range in the preliminary recommendations and BACWA would like to comment in the areas of funding and scoring. BACWA is the lead entity responsible for the wastewater and recycled water areas of the Bay Area IRWM Plan.

Amount of Funding Available

As described in the IRWM Guidelines DWR and the SWRCB are reserving a large amount of funding, on the order of \$190 million, for a second statewide IRWM grant cycle. The rationale for conducting two grant cycles with Proposition 50 IRWM funding, as discussed during development of the Guidelines, was to reserve funding for plans and projects that might not be ready to proceed during the first cycle. Now that Proposition 84 has been approved by voters, which contains \$1 billion in IRWM funding dedicated to specific regions and purposes, the rationale for maintaining the second cycle funding reserve should be re-visited and rearticulated. There seems to be an opportunity for DWR and SWRCB to implement more proposals and realize IRWM benefits sooner without adversely affecting later developing plans or projects.

A tremendous amount of effort went into organizing IRWM plans within regions and preparing information intensive proposals at Step 1 and Step 2. Several regions, including the Bay Area, had the added task of consolidating multiple proposals in a short timeframe between Step 1 and Step 2. BACWA encourages the state agencies to fully explore if more of the proposals can be implemented now to take advantage of all the work that has been done to present ready-to-proceed projects that will yield both regional and statewide benefits, including reduced dependence on the delta. Innovative projects will not be going forward to the extent they otherwise could due to lack of funding. Moving more money out the door sooner has multiple benefits to the state in the form of more jobs and tax revenue, in addition to the physical project benefits.

Scoring for the Bay Area Proposal

The complexity and difficulty of developing and implementing a scoring system for a new grant program is understood and BACWA has no reason to question the overall framework. However, we would like to understand the scoring for the Bay Area proposal where several scoring categories were marked lower at Step 2 than at Step 1 or not changed in response to improvements that were made to the IRWM Plan and proposal.

1. **Statewide Priorities.** At Step 1 the Bay Area received a High-Med ranking in this category that would translate to 24 points at Step 2. However, the Bay Area received a Medium ranking at Step 2 (18 points) even though nothing was subtracted from the Step 1 proposal and in fact, more work was done. We specifically looked for opportunities to include projects benefiting disadvantaged communities as described in the proposal and changed one of the conservation projects to focus on multi-family dwellings. Another project addressing risk reduction from fish consumption S.F. Bay was described, but did not have the information to meet Step 2 requirements. Additionally, emergency preparedness for earthquake or levee failure through interties was further developed in Step 2.
2. **Water Management Strategies and Integration.** Scored four points at Step 1 and only three points at Step 2 even though the integration section was further developed in response to a stakeholder workshop prior to the Step 2 deadline.
3. **Impacts and Benefits.** Scored three points at Step 1 and two points at Step 2. Inter-regional benefits, including reduced dependence on the imported water from multiple regions were identified in the proposal and the evaluation even notes this under Statewide Priorities. And more work was also done on projects for disadvantaged communities as explained above.
4. **Data Management.** Scored three points at Step 1 and two points at Step 2. The website discussed in the proposal contains a vast amount of information that was not available or publicly accessible at Step 1.
5. **Stakeholder Involvement.** As discussed in the Step 2 proposal three of four public workshops on the IRWMP, covering objectives, integration and

prioritization, were held prior to the June 28, 2006 proposal deadline and a public website to provide information and receive input was up and running. The e-mail distribution list for notices includes 2000 persons. Yet, the score for stakeholder involvement remained unchanged from Step 1 to Step 2. This category was significantly improved from Step 1, but not recognized.

The monthly BACWA Board meeting is scheduled for the same time and day as DWR's public meeting on the preliminary IRWM funding recommendations so a BACWA official will not be able to attend. Please give these comments thorough consideration, particularly whether it might be possible to fund additional proposals at this time instead of waiting. One or more representatives from participating Bay Area agencies may attend the meeting to provide more input or obtain feedback.

Sincerely,

A handwritten signature in black ink, appearing to read "Michele Pla". The signature is written in a cursive, flowing style. To the left of the signature, there is a small, handwritten "s/" or similar mark.

Michele Pla
Executive Director